California Regional Water Quality Control Board

Los Angeles Region

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Linda S. Adams
Cal/EPA Secretary

Arnold Schwarzenegger
Governor

October 20, 2010

Mr. James Stull
Continental Heat Treating
10643 Norwalk Boulevard
Santa Fe Springs, CA 90670

COMMENTS ON GROUNDWATER WELL INSTALLATION AND SAMPLING REPORT, AND REQUIREMENT TO SUBMIT A WORK PLAN FOR ADDITIONAL GROUNDWATER INVESTIGATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER – CONTINENTAL HEAT TREATING, 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS, CA (SCP NO. 1057, SITE ID NO. 204GW00)

Dear Mr. Stull:

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is the State regulatory agency responsible for protecting water quality in Los Angeles and Ventura Counties. To accomplish this, the Regional Board issues investigative orders authorized by Porter Cologne Water Quality Control Act (California Water Code [CWC], Division 7). The Regional Board issued a CWC section 13267 Order to you dated May 5, 2010 (Order), indicating that soil, soil-gas and groundwater investigation is needed to delineate the lateral and vertical extent of contamination at the subject site (Site). In response to the Order, your consultant, Fero Environmental Engineering, Incorporated (Fero) prepared and submitted the document *Groundwater Monitoring Well Installation and Sampling Report* (Report) dated September 14, 2010.

The Report details the installation of three on-Site groundwater monitoring wells in accordance with a work plan dated March 4, 2002 and the Regional Board's approval letter dated April 16, 2002. During the installation of these wells, soil matrix samples were collected at five-foot intervals from the depths of 5 to 95 feet below ground surface (bgs) in each boring. The soil matrix samples were submitted for laboratory analysis of volatile organic compounds (VOCs) using US Environmental Protection Agency (USEPA) Method 8260B. Analytical results indicate that VOCs were detected in soil samples collected between 5 to 35 feet bgs in boring MW-1, between 5 to 95 feet bgs in boring MW-2, and between 10 and 60 feet bgs in boring MW-3. The highest concentrations of VOCs detected in soil during the installation of the three monitoring wells were in boring MW-2. Tetrachloroethene (PCE) was detected at concentrations up to 3,250 µg/kg in boring MW-2 at a depth of 35 feet bgs.

Groundwater was encountered at a depth of approximately 98 feet bgs in the well borings. The three groundwater wells were installed to a depth of approximately 120 feet bgs and screened between the depths of 90 to 120 feet bgs. Following installation and development of the three groundwater wells, groundwater samples were collected and analyzed for VOCs. Based on the water elevation data included in the Report, groundwater is flowing to the southwest beneath the Site. Water quality data indicate that groundwater has been impacted with VOCs above California drinking water Maximum Contaminant Levels (MCLs) in all three groundwater monitoring wells. Notable maximum concentrations of VOCs in groundwater at the site included PCE up to 235 µg/L, trichloroethene (TCE) up to 178 µg/L,

cis 1,2-dichloroethene (cis 1,2-DCE) up to 59.6 µg/L, 1,1-dichloroethene (1,1-DCE) up to 224 µg/L, and 1,2-dichloroethane (1,2-DCA) up to 113 µg/L.

Following our review of the Report and other file documents, we have the following comments and requirements:

1. As indicated in the Order, additional groundwater wells must be installed to evaluate and monitor groundwater quality in the areas of identified and potential on-Site sources. This evaluation must include assessments of the lateral and vertical extent of the VOC plume in groundwater, including installation of multi-depth monitoring wells or sampling points. Multi-depth and discrete groundwater samples shall be collected from water bearing zones or at a minimum of every 20 feet if the lithology appears consistent over a large depth interval, or until a competent clay boundary with a minimum thickness of 5 feet is encountered (verified by collection and submission of a soil sample at the boring termination depth for analysis of physical properties). A work plan for further groundwater investigation at the Site is due to the Regional Board by **January 14, 2011.**

   To adequately characterize the site soil condition, at least 2 to 3 well borings shall be continuously cored and logged to their drill depths. In addition to chemical data, soil physical parameters, such as particle size, air and water permeabilities, porosities (total, air-filled, and water filled), bulk density, water content, total organic carbon content, and other data you find relevant, shall be collected. Both the chemical and the physical data will be used for evaluation of contaminant fate and transport in the subsurface porous media, and for the possible future site remedial action plan preparation.

2. The Report did not include a copy of the well survey report. Please submit a copy of this report signed by the licensee by **November 30, 2010**.

3. In addition to the information provided in the Report, all future groundwater monitoring reports shall include the following:

   - Plan-view and cross-section maps/figures showing the extent of dissolved-phase contamination in the saturated zone, including isoconcentration maps for all primary contaminants of concern (COCs) at the Site.

   - Field data sheets detailing date and time of sampling, Site identification and address, groundwater monitoring well identification, gauging and purging information, and purge data (i.e., cumulative volume, temperature, pH, specific conductivity, turbidity, etc.).

   - A separate table section (in lieu of including tables within the text) for easier reference of all tabulated data.

   - A table detailing the well construction of all existing (and any future) groundwater monitoring wells at the Site.

- In the table with groundwater elevation data, include the date the groundwater well was gauged and the measured depths to groundwater and well bottoms (feet below the top of the well casing).

- In the table summarizing groundwater quality analyses, include the date the groundwater well was sampled and the laboratory detection limits for the primary COCs at the Site.

4. A Site health and safety plan (HASP) must be available and implemented at the Site during all future quarterly groundwater monitoring events. You shall submit a copy of the HASP for groundwater monitoring activities to the Regional Board at least 5 days prior to conducting the next quarterly groundwater monitoring at the Site.

The requirement to submit the above technical reports is an amendment to the existing CWC section 13267 Order issued by this Regional Board on May 5, 2010. Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars ($1,000) per day for every day each report is not received.

If you have any questions, please contact the project manager Mr. David Young at (213) 576-6733 or via email at dyoung@waterboards.ca.gov.

Sincerely,

Samuel Unger, PE
Executive Officer

cc: Mr. Michael A. Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Mr. Bob Schneider, Trilogy Regulatory Services
Mr. Rick Fero, Fero Environmental Engineering, Incorporated